

January 13, 2020

By ECF

Honorable Naomi Reice Buchwald United States District Court Southern District of New York 500 Pearl St. New York, NY 10007-1312

Re: Williams v. Equitable Acceptance Corp., 18-cv-7537

Dear Judge Buchwald:

The parties to the above-captioned action write jointly following the December 9 oral argument on defendant Equitable Acceptance Corporation's motion to dismiss. Following discussions before Your Honor relating to potential settlement, and Your Honor's representation that the Court would refrain from issuing a decision on the motion for a short period to facilitate further settlement discussions, the parties have engaged in preliminary settlement discussions. We believe judicial assistance would help facilitate a possible settlement, and respectfully request a referral to a magistrate judge for such a conference.

The parties respectfully request a stay of litigation for 30 days to permit these further settlement discussions, request that the Court continue to hold its decision on the motion to dismiss during that period, and request that the Court schedule a status conference at the conclusion of that period.

Respectfully Submitted,

/s/ Danielle Tarantolo

Danielle Tarantolo Jessica Ranucci

NEW YORK LEGAL ASSISTANCE GROUP

7 Hanover Square New York, NY 10004 (212) 613-5000

dtarantolo@nylag.org

7 Hanover Square, New York, NY 10004 t:212.613.5000

f:212.750.0820 nylag.org

/s/ Jonathan Oblak

Jonathan Oblak
Stephen Schweizer
Anna Deknatel
QUINN EMANUEL URQUHART
& SULLIVAN, LLP
51 Madison Avenue, 22nd Floor
New York, NY 10010
(212) 849-7199
jonoblak@quinnemanuel.com

Counsel for Plaintiffs

/s/ Gregory Joseph

Gregory P. Joseph (gjoseph@jha.com)
Sandra M. Lipsman (slipsman@jha.com)
Gila S. Singer (gsinger@jha.com)
JOSEPH HAGE AARONSON LLC
485 Lexington Avenue, 30th Floor
New York, New York 10017
(212) 407-1200

Counsel for Defendant Equitable Acceptance Corporation